

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MASTERS PHARMACEUTICAL, INC.	:	Case No.: 1:14-cv-551
	:	
Plaintiff,	:	Judge Michael R. Barrett
	:	
vs.	:	PLAINTIFF'S AMENDED
	:	DISCLOSURE OF FACT
DEVOS, LTD., d/b/a GUARANTEED RETURNS	:	<u>WITNESSES</u>
	:	
Defendant.	:	
	:	

Plaintiff Masters Pharmaceutical, Inc. ("Masters"), through its counsel and pursuant to this Court's Amended Calendar Order hereby gives notice that it intends to call the following fact witnesses during its case in chief:

1. Dennis Smith
Masters Pharmaceutical, Inc.
8695 Seward Road
Fairfield, OH 45011
(can be contacted through counsel)

Mr. Smith is the President of Masters and is expected to testify about Masters' business model, the pharmaceutical reverse distribution industry in general, Masters' decision to use Defendant as its reverse distributor, programs offered by other reverse distributors, Masters' damages and other relevant subject matter.

2. Mike Warner
Masters Pharmaceutical, Inc.
8695 Seward Road
Fairfield, OH 45011
(can be contacted through counsel)

Mr. Warner is a Vice President of Sales at Masters and is expected to testify about his communications with representatives of Defendant, the efforts he made

to monitor and reconcile Masters' accounts with Defendant, the products Masters delivered to Defendant for return, and other relevant subject matter.

3. Kevin Moore
Masters Pharmaceutical, Inc.
8695 Seward Road
Fairfield, OH 45011
(can be contacted through counsel)

Mr. Moore is the Chief Financial Officer of Masters and is expected to testify about Masters' accounts with Defendant, his efforts to monitor and reconcile those accounts, payments Masters received from Defendant, Masters' damages and other relevant subject matter.

4. Joe Delaney
11950 Idaho Ave.
Los Angeles, CA. 90025
518-330-5296

Mr. Delaney is a former employee of Defendant. He is expected to testify about the relationship between the parties, Defendant's use of estimated return values to establish its fees, Defendant's efforts, or lack thereof, to return its customers' products, Defendant's business practices in general and with respect to Masters in particular, and other relevant subject matter.

5. Sharon Curley, as if upon cross-examination.

Ms. Curley is an employee of Defendant, and will be called to testify, as if upon cross-examination, about information contained within her deposition, the exhibits thereto, as well as other documents produced by the parties during discovery, and other matters relating to Plaintiff's claims, and Defendant's defenses thereto.

6. Nick Paul, as if upon cross-examination.

Mr. Paul is an employee of Defendant, and will be called to testify, as if upon cross-examination, about information contained within his deposition, the exhibits thereto, as well as other documents produced by the parties during discovery, and other matters relating to Plaintiff's claims, and Defendant's defenses thereto.

Masters reserves the right to call any other witness identified by Defendant during Masters' case in chief as if upon cross-examination. Plaintiff also reserves the right to supplement this witness list in response to any defenses that may be raised by Defendant or as required by additional discovery.

Respectfully Submitted,

s/Richard T. Lauer

Richard T. Lauer (OH Bar #0063467)

Trial Attorney for Plaintiff

8695 Seward Road

Fairfield, OH 45011

Telephone: 513-619-8038

Email: rlauer@mastersrx.com

Certificate of Service

I hereby certify that on February 15, 2016, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. A copy of the foregoing document was also served via email on the following:

Paul J. Cosgrove, Esq.
pcosgrove@ulmer.com

Alyson Terrell, Esq.
aterrell@ulmer.com

Joshua Klarfeld, Esq.
jklarfeld@ulmer.com

s/Richard T. Lauer

Richard T. Lauer